

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ROBBIE DOW GOODMAN,
WILLIAM CASEY, and
RAYMOND COBB,
Plaintiffs,

v.

LORIE DAVIS, Director, TDCJ-CID,
Defendant.

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Civil Action No. 2:12-CV-166

**THE PARTIES' JOINT ADVISORY REGARDING
PLAINTIFFS' BILL OF COSTS AND APPLICATION FOR FEES**

TO THE HONORABLE JUDGE NELVA RAMOS:

Defendant Lorie Davis, named in her official capacity as Director of the Correctional Institution Division, Texas Department of Criminal Justice, (hereafter "Defendant") and Plaintiffs Robbie Dow Goodman, William Casey, and Raymond Cobb (collectively "Plaintiffs") together file this joint advisory to the Court regarding Plaintiffs' Bill of Costs and Application for Fees (ECF No. 329). 42 U.S.C. § 1988(c) does not permit a prevailing party to include expert fees as part of the attorney's fees for an action to enforce the Religious Land Use and Institutionalized Persons Act of 2000 [42 U.S.C.A. § 2000cc, *et seq.*]. Consequently, Plaintiffs have agreed to modify their pending request and remove their request for expert fees. Defendant does not oppose the remainder of Plaintiffs' bill of costs and application for fees.

PRAYER

Reflecting the Parties' mutual understanding described above, Plaintiffs respectfully ask this Court to award the following to Plaintiffs, relief that is unopposed by Defendant:

1. Total Costs of \$9,803.19: \$811.20 in transcript costs; \$1,886.52 in printing costs; and \$7,105.47 in deposition transcript costs; and
2. Total Attorney Fees of \$131,298.45: \$109,951.10 in attorney fees; \$17,595.00 in paralegal fees; and \$3,752.35 in travel costs.

Dated this 2nd day of April, 2019.

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/s/ R. Paul Yetter

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CERTIFICATE OF SERVICE

I, **Benjamin Dower**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing document was filed electronically with the Court and delivered by CM/ECF on April 2, 2019:

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